

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

PAULA SUE SHOTWELL

Plaintiff,

vs.

THE CITY OF MEMPHIS

Defendant.

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CIVIL ACTION NO. 09-2754-STA-dkv

**MOTION TO AMEND SCHEDULING ORDER TO
EXTEND DISPOSITIVE MOTION DEADLINE**

Comes now Defendant City of Memphis by and through counsel, Linda Nettles Harris, and files this motion requesting to amend the scheduling order to extend the dispositive motion deadline until one month following the close of discovery. As grounds for this motion, the Defendant City of Memphis would state as follows:

1. On March 21, 2012, the undersigned entered a notice of appearance as counsel of record in this case.
2. On Thursday, May 3, 2012, undersigned counsel reviewed the scheduling order in this case and discovered that the dispositive motion deadline in this case is May 4, 2012.
3. The discovery deadline in this case is May 11, 2012, and the Defendant has scheduled Plaintiff's deposition for Thursday, May 10, 2012.
4. Defendant City of Memphis needs to depose the Plaintiff prior to filing a dispositive motion in this case. Moreover, it is unusual for the dispositive motion deadline to precede the discovery deadline, as information needed to determine if such a motion is warranted is still outstanding.

5. For the above reasons, Defendant City of Memphis respectfully requests that this Court grant its Motion to Amend the Scheduling Order to Extend the Dispositive Motion Deadline to one month following the discovery deadline.

Respectfully Submitted,
NETTLES HARRIS LAW FIRM PLLC

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CERTIFICATE OF CONSULTATION

Pursuant to the Local Rules of this Court, on Friday, May 4, 2012, undersigned counsel called the Plaintiff's home telephone number in an attempt to consult with Plaintiff regarding this motion but was unable to reach Plaintiff. It is unknown if Plaintiff objects to this motion.

s/Linda Nettles Harris

CERTIFICATE OF SERVICE

I, Linda Nettles Harris, Counsel for the City of Memphis, do hereby certify that a true copy of the foregoing Motion to Amend Scheduling Order to Extend Dispositive Motion Deadline was sent by 1st Class mail, postage prepaid, to Ms. Paula Shotwell, 4767 Gill Drive, Memphis, TN 38109, this 4th day of May 2012.

s/Linda Nettles Harris